

# **EXHIBIT G**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

KENNETH L. HOLLAND,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C. A. No. 05-464-SLR
	)	
STANLEY TAYLOR, et al.,	)	
	)	
Defendants.	)	
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ADAM J. BRAMBLE,	)	
	)	
Defendant,	)	
Counter-claim plaintiff,	)	
	)	
v.	)	
	)	
KENNETH L. HOLLAND	)	
	)	
Plaintiff,	)	
Counter-claim defendant.	)	

**AFFIDAVIT OF KENT RAYMOND**

I, Kent Raymond, having been duly sworn according to law, depose and state as follows:

1. I am employed by the State of Delaware Department of Correction ("DOC@) as the Counselor Supervisor at the Morris Community Correctional Center, (AMCCC@) Dover, Delaware. I have been employed in this capacity since November 12, 1991. My duties and responsibilities include supervising counseling staff, providing rehabilitative services to offenders assigned to the MCCC and helping with their transition back into the community. I am responsible for preparing or overseeing the

preparation of treatment plans, assessments, and status reports to ensure appropriate offender case management. I also serve as a voting member of the facility's Multi-Disciplinary Team.

2. I make the following statements based upon my personal knowledge.

3. On June 17, 2004, Plaintiff Kenneth Holland ("Holland") was transferred from the Central Violation of Probation Unit ("CVOP") to the MCCC to participate in work release. During intake, Holland received a copy of the MCCC Orientation Manual and signed the Resident Signature Form acknowledging such on June 22, 2004.

4. On June 27, 2004, Holland was written up with a program violation by security staff for "Disorderly Behavior, and Disorderly and Threatening Behavior towards staff." When a resident is presented with a program violation, he is given the opportunity to review it and then to sign the form acknowledging its existence. Shortly thereafter, the Multi-Disciplinary Team ("MDT") holds a hearing on the program violation. Holland checked the box on the program violation form indicating his desire to attend his hearing.

5. The Classification Board or Multi-Disciplinary Team meets weekly (usually on Tuesdays as staffing permits) and commences at approximately 9:00 AM. This is memorialized in the MCCC's Orientation Manual which Holland received on June 22, 2004. The following items are discussed at Classification: Program Violations, Requests to Drive, Special Requests, Weekly Phase List and Treatment Passes.


6. Holland's hearing was held on Tuesday, June 29, 2004 at 9:00 AM to review Holland's program violation. Although Holland indicated that he wanted to be present at the hearing, he was not in attendance. Holland chose to go to his work place on

June 29, 2004, instead of attending his hearing. For his program violation, the MDT sanctioned Holland to two weeks to Sussex Violation of Probation Unit ("SVOP"). Following his stay at SVOP, Holland was to be transferred to Central Violation of Probation ("CVOP") to await bed space at work release. The MDT's recommendation was reviewed and approved by MCCC's Warden Vince Bianco.

7. The decisions of the MDT are final there are no appeals.

  
Kent Raymond

SWORN AND SUBSCRIBED before me this 3rd day of June, 2008.

  
Notary Public